



File Code: 2400; 1950
Date: April 13, 2018

Dear Interested Party:

The Grand Mesa, Uncompahgre and Gunnison National Forests (GMUG), Gunnison Ranger District, is inviting you to comment on a proposal concerning treatment of areas of lodgepole pine and Engelmann spruce forest in the Upper Taylor River and Spring Creek drainages. The intent is to actively and adaptively manage vegetation to improve forest health and resiliency while also reducing the buildup of fuel decreasing the potential for catastrophic wildfire. The proposal implements the goals and objectives of the 1991 Grand Mesa, Uncompahgre and Gunnison National Forests Land and Resources Management Plan, as amended, and the 2016 Forest Service Ecological Restoration Policy, incorporating best available science related to lodgepole pine dwarf mistletoe control. Treatments would be carried out on National Forest System (NFS) Lands.

Background

The Gunnison Ranger District has approximately 285,000 acres of lodgepole pine-dominated forest with an additional 162,000 acres of lodgepole pine mixed with other dominant tree species. Extensive surveying estimates that 52 percent of those lodgepole forests, or approximately 232,000 acres, have some level of dwarf mistletoe infestation.

Dwarf mistletoe is a parasitic plant exclusively hosted by conifers primarily impacting trees by disrupting nutrient cycling that can strongly influence forest structure and dynamics. Lodgepole pine dwarf mistletoe (*Arceuthobium americanum*) is considered especially lethal. It spreads primarily through explosive ejection of its seeds from hydrostatic pressure in the fruits allowing a spread distance of 50 to 75 feet, although most seeds fall within 33 feet of the host tree or on other parts of the same tree. Dwarf mistletoe weakens host trees, making them more susceptible to mountain pine beetle and pine engraver (*Ips*) mortality, increases risk of wildfire mortality, increases surface fuel loadings, and mistletoe brooms act as fuel ladders which can carry surface fire higher up into the tree canopy. Heavily infested stands lose approximately eight percent of their trees each decade. In stands that have been impacted for more than 80 years, up to 15 percent of the trees may die each decade.

Since the early 1960s, the GMUG has made progress on regenerating diseased lodgepole pine stands and ensuring that those regenerating stands are free of dwarf mistletoe, or "sanitized." In the Taylor Park EA analysis area, 6,363 acres of lodgepole pine has been previously regenerated and sanitized on suited lands. There is a need to expand upon that progress and continue to increase the size and extent of commercial lodgepole pine forest that is relatively free of dwarf mistletoe infestations. The key tool for achieving the primary project purpose of sanitizing dwarf mistletoe infested tree stands is to identify then remove infected trees stands within a 150 feet of healthy tree stands. The best tool for removing the infected trees is through commercial timber



harvest. The desired outcome from proposed harvest activities is regenerated healthy stands of lodgepole pine free from dwarf mistletoe while reducing fuel loads concurrently.

Areas of spruce-fir and quaking aspen forest across the National Forest have been the focus of commercial and noncommercial mechanical treatments, prescribed fire and other treatments to restore ecosystem resiliency under the Spruce Beetle Epidemic and Aspen Decline Management Response (SBEADMR) project since 2016. The proposed Taylor Park EA would complement the SBEADMR project by adopting an adaptive management approach in the Taylor Park area by treating dwarf mistletoe infestations, improving spruce resiliency, and managing wildland/urban interface fuel loading in forest types outside of, but adjacent to, those addressed by SBEADMR.

This project will be developed under the authority of the Healthy Forest Restoration Act (HFRA) (P.L. 108-148). It is eligible as an authorized project under this law because all treatments are in areas designated in accordance with section 602 of HFRA.

Purpose and Need for Action

The primary purpose of the treatments proposed in this area (*Taylor Park Vegetation Management Environmental Assessment* or *Taylor Park EA*) is to increase the forest's ability to respond to multiple and interactive stressors including climate change, drought, insect attack, or disease while promoting safety and reducing fuel loading in the Wildland-Urban Interface (WUI) and surrounding areas. Based on the described conditions above and Forest Plan direction, the need for this project is to manage forest vegetation to bring current and foreseeable conditions closer to desired conditions on landscapes where commercial harvest can be implemented appropriately and effectively.

This will be accomplished by:

- harvesting and subsequently regenerating through natural and artificial regeneration dwarf mistletoe infested stands using clearcutting, overstory removal, and thinning treatments;
- pre-commercial thinning young lodgepole pine stands to improve tree growth and vigor while controlling dwarf mistletoe;
- promoting regeneration and multiple age classes of trees in spruce-fir or spruce-fir-lodgepole stands through group selection;
- removal of hazard trees along Taylor Canyon and Spring Creek Roads (CR 742 and FR 744);
- using commercial harvest, non-commercial felling, thinning, and pile burning to reduce fuels and fire hazard in the WUI; and
- salvaging trees recently killed by spruce beetle, mountain pine beetle, and Douglas fir bark beetle for commercial wood products.

The secondary purpose of these treatments is to provide wood products for the local economy which relies on wood fiber harvested sustainably off of public lands.

The project implements management direction identified in the amended Grand Mesa Uncompahgre and Gunnison National Forests Land and Resource Management Plan (Forest Plan) (1983, amended 1991, 1993, 2008 and 2012). This proposed action responds to goals and objectives described in the Forest Plan and moves the project area towards desired conditions (Forest Plan, 1991, pages III-1 through III-5). Specifically, the Forest Plan goal for vegetation is to “manage vegetation in a manner to provide and maintain a healthy and vigorous ecosystem resistant to insects, diseases and other natural and human causes.”

Proposed Action (see attached map)

Proposed treatments are on lands within the Wildland-Urban Interface (WUI) or contain/are adjacent to lands that contain an insect or disease that poses a significant threat to the ecosystem. All lands proposed for treatment are outside of wilderness areas, wilderness study areas, Colorado Roadless Areas, and designated recreation management areas.

Of the 15,165 acres of proposed treatment, approximately 1,000 acres are in the spruce-fir or spruce-fir-lodgepole forest type where group selection, overstory removal, or spruce bark beetle salvage clearcut is proposed. Most of the remaining 14,165 acres are lodgepole pine-dominated forest. Approximately 4.9% (11,354 acres) of the infested portion of the district is proposed to be treated for dwarf mistletoe or approximately 2.5% of the lodgepole communities on the Gunnison Ranger District.

In the proposed fuel treatment areas (2,811 acres), the primary objective of the treatments is wildfire severity reduction along with dwarf mistletoe sanitation.

Proposed treatments preliminarily identified for suitable sites within the project area are listed in the following table, along with their acreages and which of the project purposes each would support. Ultimate acreage of each treatment is likely to change over the course of the project. Treatments will be refined during implementation as additional inventory is completed.

Treatment	Acres
Dwarf Mistletoe Edge Strip Cuts or Clearcut	3,609
Overstory Removal	734
Shelterwood Seed Cut (or Group Selection in Spruce or Clearcut if Mistletoe is Present)	714
Group Selection in Spruce	741
Prescription To Be Determined, Mixed-species	193
Young Stand -- Precommercial Thinning, Sanitation, or No Immediate Treatment	6,363
Fuel Treatment	2,811
TOTAL	15,165

Wood products proposed to be removed in all operations would be used to meet the needs of local industry and to provide economic benefits to regional communities. These activities would be planned where existing strategic plans, laws and policy indicate they are appropriate and where forest system roads are adequate to meet the needs of access and product removal. Wood products may include sawlogs, firewood, fence stays, posts, poles, pilings, and other specialty wood products.

Some temporary road construction would likely be needed. Temporary roads will be obliterated at the end of use. Any new permanent administrative-use roads (Level 1) constructed for this project would be closed to public motorized and mechanized use after operations are completed. Existing administrative use roads maybe reopened for operational use, then closed afterwards. The intention is to maintain the open road and trail system as defined by the 2010 Gunnison Travel Management Plan Decision as displayed on the current Motor Vehicle Use Map for the Gunnison Ranger District.

More information on specific treatments can be found in the “TaylorPark_ProposedVegetationTreatmentDetails_Scoping” document available here: <https://www.fs.usda.gov/project/?project=53662>.

Project Design Features

Each treatment would include design features to protect the environment or mitigate undesirable effects to other natural resources. Design criteria to be used under specific on-the-ground conditions have been drafted (Taylor Park_DesignFeatures_Scoping) and are available here: <https://www.fs.usda.gov/project/?project=53662>.

Since the decision will be implemented using an adaptive management process, the use of monitoring results to advise Forest Service managers is critical to the success of the project. Basic steps used in the adaptive management process are:

- An Interdisciplinary Team (IDT) will be used to complete all required surveys for a particular project area, complete required layout and marking of the stand, decide the appropriate design features to be applied based on surveys and determine how best to implement required monitoring to ensure mitigations used are effective. A project “checklist” documenting compliance with requirements of the EA will be completed. Members of the IDT and the District Ranger will sign the checklist documenting compliance prior to implementation of the final proposal;
- Projects will be implemented through timber sale contracts, service contracts, or other appropriate mechanisms. Forest Service employees (e.g. sale administrators) will oversee provision of the contract to ensure compliance;
- During and following implementation of vegetation treatment projects, monitoring required by the EA will be completed. Findings will be summarized in an annual monitoring report that will be posted on the Forest website and used to inform future management decisions;

Nature of Decision to Be Made

I, as the Gunnison District Ranger, am the Responsible Official for the Taylor Park EA project. After considering the proposed action and any alternatives, the environmental analysis and public comments, I will decide whether to authorize treatments to remove infested trees, treat fuels, thin stands, and remove hazard trees. If an action alternative is selected, I will decide where treatments may occur and what actions are appropriate and may be taken. Finally, the

decision will include the scope of monitoring that should occur. No Forest Plan amendment is proposed.

This environmental analysis will be documented in an Environmental Assessment. A “No Action” alternative and other alternatives that may be developed during the public comment period will be considered. No cooperating agencies have been identified.

Scoping Process

This letter initiates the scoping process, which guides the development of the environmental assessment. It is important that reviewers provide their comments at such times and in such manner that they are useful to the agency’s preparation of the environmental assessment. Therefore, comments should be provided prior to the close of the comment period and should clearly articulate the reviewer’s support from the proposal, concerns or desires to see the scope of the project broadened or narrowed.

This opportunity to comment serves two purposes: 1) as scoping for this project under the requirements of the National Environmental Policy Act (40 CFR 1501.7); and 2) as a comment period described at 36 CFR 218.5 (a) for establishing eligibility to object to a future USFS decision. Comments received in response to this solicitation, including names and addresses of those who comment, will be part of the public record for this proposed action. Comments submitted anonymously will be accepted and considered, however anonymous commenters will not be eligible to object.

Opportunity to comment on the scope of the Proposed Action ends 30 days following the publication date of the Legal Notice of request for public comments in the *Gunnison Country Times*, the newspaper of record for the Gunnison Ranger District. Comments submitted in the following formats will be accepted: written, facsimile, hand-delivered and electronic. In order to be eligible to object to the USFS’s decision on this project, individuals must comment during this 30 day comment period per 36 CFR 218.32(a). Specific written comments are defined in 36 CFR 218.2. Also, for objection eligibility, each individual or representative from each organization submitting comments must either sign the comments or verify their identity upon request.

Mail comments regarding the Taylor Park EA Project to:

Matthew M. McCombs
Gunnison District Ranger
216 N. Colorado
Gunnison, CO 81230
Fax comments to: 970-642-4425.

Please submit Electronic Comments on the following website:

<https://www.fs.usda.gov/project/?project=53662>, through the “Comment/Object on Project” link found on the right hand side of the page. Electronic attachments to comments (e.g. .doc, .txt, .rtf or pdf) may also be submitted.

Hand delivered written comments will be accepted at the GMUG National Forests, Gunnison Ranger District, 216 North Colorado Street, Gunnison, Colorado, between the hours of 7:30 a.m. and 4:30 p.m., Monday through Friday, except for Federal holidays.

It is important that reviewers understand that only those individuals and entities that submit timely and specific written comments during the official comment period will be allowed to file objections during the objection period which follows publication of the environmental assessment and draft decision notice. Objections filed according to the conditions in 36 CFR 218 will be reviewed by a Reviewing Officer, who will submit a written response to objections. The final notice of decision will be issued only after all the concerns and instructions identified by the reviewing officer have been addressed.

Other Information

In addition to this opportunity to submit written comments, as required under HFRA, the public will be invited to collaborate on the development of the final proposed action. As part of the SBEADMR EIS project development process the GMUG established the Science Team of academic and scientific researchers; additionally, local interested parties developed the Adaptive Management Group comprised of a diverse group of science and industry professionals, local elected leaders and advocacy organizations. I intend to utilize these existing entities to meet the collaborative intent of HFRA. However, interested entities or members of the public are encouraged to engage collaboratively as desired and I will facilitate a means to involve them. Additionally, I will be hosting a meeting for interested members of the public and representatives of the Gunnison Ranger District during the development of the Taylor Park EA project. This meeting will be held in Tincup, Colorado, during the summer of 2018. More detailed information about the meeting location and schedule will be available closer to the meeting date.

Additional project details and supporting documentation can be found here:
<https://www.fs.usda.gov/project/?project=53662>.

For additional questions, please contact John Slown, Project Environmental Coordinator at 406-239-3749; email jslown@fs.fed.us.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Matthew M. McCombs', is written over a light blue horizontal line.

MATTHEW M. MCCOMBS
District Ranger

cc: Clay Speas, Drew Stroberg